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July 1, 2020

VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Sanders v. Trader Joe's Company*, No. 1:20-cv-00496 (VEC)

Dear Judge Caproni:

I represent Defendant Trader Joe's Company in the above-referenced matter. In accordance with Your Honor's Individual Practices in Civil Cases, Plaintiff and Defendant jointly request that the deadline for initial disclosures be extended by 30 days, up to and including August 10, 2020, while the parties focus on settlement discussions.

On June 10, 2020, Your Honor entered the Civil Case Management Plan and Scheduling Order (Dkt. 23) and "encourage[d] the parties to promptly exchange the discovery necessary to facilitate settlement discussions" (Dkt. 22 at 5). The parties are engaged in settlement discussions, and Defendant will be producing information to facilitate them. The requested extension will not inhibit the parties' settlement discussions.

The parties' current deadline to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) is July 10, 2020. The parties respectfully request to extend this deadline by 30 days, up to and including August 10, 2020. The requested extension would align the upcoming litigation-related deadlines (Defendant's anticipated motion to dismiss also is due August 10) and allow the parties to conserve resources and focus on settlement discussions in the meantime.

This is the first request to extend the initial disclosures deadline, and this request does not affect any other scheduled dates.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "S Brew", with a stylized flourish at the end.

Sarah L. Brew